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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

Jeff Corbett, an individual; John Jenkins, an  
 individual; Scott Murray, an individual; and  
 David Newton, an individual,

Plaintiffs,

vs.

Public Employees' Retirement System, ex rel.  
 State of Nevada; Las Vegas Metropolitan Police  
 Department, a political subdivision of the State  
 of Nevada; and Does I - X; inclusive,

Defendants.

Case No.: 2:20-cv-02149-KJD-NJK

**STIPULATION AND ORDER TO**  
**EXTEND DISPOSITIVE MOTION**  
**DEADLINE**

(Second Request)

Defendant Las Vegas Metropolitan Police Department, (the "Department" or  
 "LVMPD"), by and through its counsel of record, Nick D. Crosby, Esq., of the law firm of  
 Marquis Aurbach; and Plaintiffs, Jeff Corbett, John Jenkins, Scott Murray and David Newton  
 (collectively "Plaintiffs"), by and through their counsel of record, Daryl E. Martin, Esq. of the  
 law firm of Christensen James & Martin, Chtd., respectfully submit this Stipulation and Order to  
 Extend the Dispositive Motion Deadline.

**I. REASONS FOR THE REQUESTED EXTENSION OF TIME**

The parties are addressing a discovery dispute that was raised on December 28, 2021 by  
 Plaintiffs. Counsel conducted a meet and confer on January 7, 2022 and discussed the issues  
 raised by Plaintiffs. Pursuant to counsel's meet and confer, and to avoid the need for court  
 intervention in the discovery dispute, Defendants are supplementing certain responses to  
 discovery. In order to avoid having an incomplete discovery record while preparing dispositive

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1 motions, and to afford time for the parties to resolve the discovery dispute while not losing time  
 2 to prepare and file dispositive motions, the Parties respectfully request the Court extend the  
 3 dispositive motion/joint pretrial order deadline in this matter by 60 days. This extension is  
 4 brought in good faith and not for purposes of delay and, instead, is sought to allow sufficient  
 5 time for the parties to successfully resolve the discovery dispute without the need for court  
 6 intervention, while also allowing sufficient time for the parties to prepare dispositive motions,  
 7 should they so desire.

## 8 **II. PROPOSED SCHEDULE**

9 With the above in mind, the Parties hereto agree to extend the current Dispositive Motion  
 10 deadline 60 days from January 27, 2022 to March 28, 2022.

11 In accordance with LR 26-1(e)(5), the last day to file a Joint Pretrial Order shall be April  
 12 27, 2022. In the event dispositive motions are filed, the date for filing the Joint Pretrial Order  
 13 shall be suspended until thirty (30) days after decision on the dispositive motion or upon further  
 14 Order by the Court extending the time period in which to file the Joint Pretrial Order.

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This request is not sought for any improper purpose or for the purpose of delay. The Parties respectfully submit that the reasons set forth above constitute good cause for the extended deadlines requested above.

IT IS SO STIPULATED this 18<sup>th</sup> day of January, 2022.

CHRISTENSEN JAMES & MARTIN, CHTD. MARQUIS AURBACH

By: /s/ Daryl E. Martin, Esq.

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**ORDER**

**IT IS SO ORDERED.**

DATED this 19<sup>th</sup> day of January, 2022.

  
UNITED STATES MAGISTRATE JUDGE

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